

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA)	Criminal No. 1:20-CR-192 (FJS)
)	
v.)	DEFENDANT EDGAR BAKER'S
)	MOTION TO MODIFY
EDGAR M. BAKER, JR., JEFFREY)	CONDITIONS OF RELEASE
DOCTOR, and CAREY TERRANCE)	TO PERMIT TRAVEL
)	
Defendants.)	

Defendant Edgar M. Baker is on pretrial release pending trial in this matter. His travel is restricted to the Eastern District of North Carolina (where he resides) and the Northern District of Georgia and the Northern District of New York for court appearances and meetings with his attorney.

Mr. Baker requests permission to travel to Las Vegas, Nevada for vacation with family. He proposes to fly from Raleigh, North Carolina on September 1, 2021, stay at the Palazzo in Las Vegas, Nevada, and fly back to Raleigh, North Carolina on September 4, 2021.

Mr. Baker has complied with all conditions of his pretrial release and has reported to his pretrial services officer as required. Mr. Baker does not pose a flight risk and has surrendered his passport to Pretrial Services. Assistant U.S. Attorney Emily Powers, the lead prosecutor on this case, has no objection to this request. Mr. Baker will provide his Pretrial Services officer with all details of his travel prior to departure.

For the foregoing reasons, Mr. Baker requests that the Court enter an order permitting his request to travel to Las Vegas, Nevada from September 1, 2021 through September 4, 2021.

Respectfully submitted this 19th day of August 2021.

By: /s/ Scott R. Grubman

Scott R. Grubman (Bar Roll No. 702103)

Brittany M. Cambre (Bar Roll No. 702104)

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Defendant Edgar Baker's Motion to Modify Conditions of Release to Permit Travel was served by ECF, on August 19, 2021, on all counsel or parties of record on the service list.

By: /s/ Scott R. Grubman

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